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July 3, 2018

**FILED & SERVED ELECTRONICALLY**

Honorable Joseph A. Dickson  
United States Magistrate Judge  
United States District Court for the District of New Jersey  
Martin Luther King, Jr. Federal Building & Court House  
50 Walnut Street,  
Newark, New Jersey 07102

**Re: *United States v. Victor Santos,***  
**Mag. No. 17-3650 (MF)**

Dear Judge Dickson:

As Your Honor may recall, this firm represents defendant Victor Santos in the above referenced matter. Enclosed is a proposed Order modifying the terms of Mr. Santos' release to allow him to travel to Portugal from on or about July 11, 2018 to on or about July 24, 2018, and for the temporary return of his United States passport and his Portuguese Citizen Card for such travel. Also enclosed is Mr. Santos' proposed itinerary for his travel to Portugal should Your Honor approve this request.

Mr. Santos has requested permission to travel to Portugal so that he may:

- Visit his cousins, including his mother's 99 year old cousin whose memory is failing (he would like to see her before she no longer remembers him.)
- Provide maintenance and upkeep on his mother's house in Portugal (the home has been vacant for some time, and as his mother will be visiting Portugal, he wishes to prepare the home for her arrival.)
- Assist his mother with her personal affairs in Portugal (his mother is 90 years old.)
- Visit the cemetery where his mother ultimately will be laid (she is not ill, but elderly; Mr. Santos routinely visits this location to check on the family plot and attend to landscaping, site clean-up, etc.)
- Travel to a religious shrine in Fatima, Portugal.
- Otherwise engage in any lawful activities.

We have communicated with the Government, and Special Assistant United States Attorney Kevin DiGregory, has graciously consented to the terms of the attached order, without prejudice to revisiting that consent based upon the Government's ongoing investigation. We have also communicated, jointly with the Government, with the United States Pretrial Services

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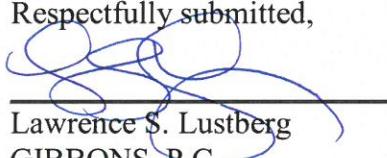
Officer Daniel Milne, with whom we shared Mr. Santos's proposed itinerary, who has made clear that, per his office's usual policy, he takes no position with regard to Mr. Santos's application, though he also noted that Mr. Santos has been completely compliant with all the terms of his release; he also suggested the additional condition, discussed below, to which the parties have now agreed.

Mr. Santos respectfully submits that he does not represent a flight risk, let alone a danger to the community. He has lived in New Jersey since 1978 and has strong ties to the New Jersey and Newark community, both on the business and personal sides. Specifically, Mr. Santos is a real estate developer and investor, and is actively working on a transaction that requires his long term local presence to be successful (e.g., working with contractors, architects and engineers, and obtaining local development approvals and permits). His primary source of income is rental income from property in New Jersey. As referenced above, in addition to his present bail package, Mr. Santos' adult daughter, Juliana Santos, has agreed to surrender her U.S. passport to the United States Office of Pretrial Services during the time when Mr. Santos is in Portugal. Mr. Santos is not married, and Ms. Santos is Mr. Santos's only child..

If the Order is satisfactory to Your Honor, please execute and file it at the Court's earliest convenience, particularly given the timing of this proposed travel and no later than July 9, 2018. Of course, if Your Honor has any questions or concerns, please do not hesitate to contact me.

Thank you very much for your kind consideration of this matter.

Respectfully submitted,

  
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cc: Kevin DiGregory, Special Assistant United States Attorney (via email and ECF)  
Charlie Divine, Special Assistant United States Attorney (via email and ECF)  
Daniel Milne, United States Pretrial Services Officer (via email)